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September 10, 2020

VIA ECF AND REGULAR MAIL

Hon. Zahid N. Quraishi, U.S.M.J. Clarkson S. Fisher Federal Building and U.S. Courthouse 402 E. State Street Trenton, New Jersey 08608

Re: UMG Recordings, Inc. et al. v. RCN Telecom Services, LLC et al.

Civil Action No. 19-17272 (MAS) (ZNQ)

Dear Judge Quraishi:

This firm, along with our co-counsel Stein Mitchell Beato & Missner LLP, represents plaintiffs in the referenced matter. I write to inform the Court that plaintiffs have also retained Jenner & Block LLP to serve as co-counsel and to seek the Court's permission for Andrew H. Bart and Jacob L. Tracer, both of Jenner & Block, to appear on behalf of plaintiffs *pro hac vice*. This letter is submitted in lieu of a formal motion, as counsel for defendants has consented to the *pro hac vice* admissions of these attorneys.

I enclose for Your Honor's consideration in this regard a copy of my Declaration submitted in support of this application as well as copies of the Declarations of Andrew H. Bart and Jacob L. Tracer. I am also enclosing a proposed form of Order providing for their *pro hac vice* admissions. We respectfully request that Your Honor enter the enclosed Order.

Respectfully yours,

McElroy, Deutsch, Mulvaney & Carpenter, LLP

GEORGE C. JONES

Enclosures

cc: All counsel (by ECF and e-mail)